

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**

**IN THE MATTER OF:**

**Geremarie Corp.**  
**1275 Ensell Road**  
**Lake Zurich, Illinois 60106**

**ATTENTION:**

**Sheri Principato**  
Vice President and CFO  
1275 Ensell Road  
Lake Zurich, Illinois 60106  
SPrincipato@geremarie.com

**Request to Provide Information Pursuant to the Clean Water Act**

The U.S. Environmental Protection Agency is requiring Geremarie Corporation (“Geremarie”) to submit certain information about the facility at 1725 Ensell Road, Lake Zurich IL 60106. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request. If you are unable to respond in a timely fashion because of impacts related to the COVID-19 pandemic, please submit a written extension request via email to [desai.sudhir@epa.gov](mailto:desai.sudhir@epa.gov), explaining the specific impacts on your ability to respond.

We are issuing this information request under Section 308(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318(a). Section 308(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides, among other things, that whenever required to carry out an objective of the Act, the Administrator of EPA shall require the owner or operator of any point source to: establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment or methods (including where appropriate, biological monitoring methods), sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and provide such other information as the Administrator may reasonably require.

Geremarie owns and operates a point source at the Geremarie, IL facility. We are requesting this information to determine whether this source is complying with the CWA.

Geremarie must send all required information to R5WECA@epa.gov and to desai.sudhir@epa.gov. If, for some reason, materials cannot be transmitted electronically, submissions can be sent to:

Water Enforcement and Compliance Assurance Branch  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency  
Region 5  
Attn: Sudhir Desai, ECW-15J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Geremarie must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a).

As explained more fully in Appendix A, Geremarie may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information submitted to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If Geremarie does not assert a business confidentiality claim when submitting the information, EPA may make this information available to the public without further notice. Geremarie should be aware, however, that pursuant to Section 308(b) of the CWA, 33 U.S.C. § 1318(b), and 40 C.F.R. § 2.302(e), effluent data, standards, and limitations are not eligible for confidential treatment.

This information collection is exempt from the Paperwork Reduction Act under 44 U.S.C. § 3518(c)(1)(B).

We may use any information submitted in response to this request in an administrative, civil or criminal action. Failure to comply fully with this information request may subject Geremarie to an enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, and 18 U.S.C. §§ 1001 and 1341.

You should direct any questions about this information request to Sudhir Desai at 312-886-6704.

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Date

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Michael D. Harris  
Director  
Enforcement and Compliance Assurance Division

## **Appendix A**

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information is not known or not available to you as of the date of submission and later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Confidential Business Information and Personally Identifiable Information Notice**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at 40 C.F.R. Part 2. Please clearly identify portions of otherwise non-confidential documents that you are claiming as confidential. EPA will construe the failure to furnish a confidentiality claim with your response to the information request may result in the information being made available to the public without further notice to you. EPA’s confidential business information (CBI) regulations are at 40 C.F.R. Part 2, Subpart B (sections 2.201-2.311). See <https://www.ecfr.gov>.

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as “Personal Privacy Information.” Disclosure of such information to the general public may constitute an invasion of privacy.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 5, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide a table of contents for the electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.*
4. Please provide documents claimed as CBI in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the information claimed as CBI.
5. Certify that all electronic submittals including attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this Information Request have their ordinary meaning unless such terms are defined in the CWA, 33 U.S.C. § 1251 *et seq.*, or 40 C.F.R. Part 122.

1. “Act” or “CWA” means the Clean Water Act, 33 U.S.C. § 1251 *et seq.*
2. “Day” or “days” means a calendar day unless expressly stated to be a working day. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of business on the next working day.
3. “Discharge of a pollutant,” as defined in Section 502(12) of the CWA, means *inter alia*, “any addition of any pollutant to navigable waters from any point source.” 33 U.S.C. § 1362(12).

4. “MGD” means millions of gallons per day.
5. “Navigable waters,” as defined in Section 502(7) of the CWA, means “the waters of the United States, including the territorial seas.” 33 U.S.C. § 1362(7).
6. “NPDES Permit” and “Permit” mean the permit issued in accordance with the National Pollutant Discharge Elimination System (NPDES) pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
7. “Outfall” means a type of “point source,” as that term is defined in Section 502(14) of the CWA, 33 U.S.C. § 1362(14), that serves as a discharge point from the facility. “Outfall” followed by an Arabic numeral means that Outfall (001 East) assigned that number in Geremarie’s industrial user permit.
8. "Record" or “records” means any recording of information in tangible or intangible form. It includes, but is not limited to: documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer printouts, and computer databases.
9. “Site” means the property located at Geremarie, 1725 Ensell Road, Lake Zurich IL 60106.
10. “Wastewater” shall mean any water/liquid and all material conveyed with that water/liquid that contains process wastewater, discarded material, noncontact cooling and/or heating water, or domestic wastewater.
11. “You” or “Your” for purposes of this Information Request refers to Geremarie and to any managers, officers, agents, employees, contractors, or other entities that perform work or act in any way on behalf of, or at the direction of Geremarie.
12. “Point source,” as defined in Section 502(14) of the CWA, means “any discernible, confined and discrete conveyance . . . from which pollutants are or may be discharged.” 33 U.S.C. § 1362(14).
13. “Pollutant,” as defined in Section 502(6) of the CWA, means “dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water.” 33 U.S.C. § 1362(6).
14. “Publicly Owned Treatment Works” or “POTW” means a treatment works, as defined in Section 212 of the CWA, 33 U.S.C. § 1292(2), that is owned by a State, Tribe, or a municipality (as defined in Section 502(4) of the CWA, 33 U.S.C. § 1362(4)). Pursuant to 40 C.F.R. § 403.3(q), the definition of POTWs includes any devices and systems used in the storage, treatment, recycling, and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if

they convey wastewater to a POTW Treatment Plant. The term also means the municipality as defined in Section 502(4) of the CWA, 33 U.S.C. § 1362(4), that has jurisdiction over indirect and direct discharges to such a treatment works.

15. A “Significant Industrial User” or “SIU” is defined as an industrial user meeting any of the following criteria:
  - a. any industrial user conducting processes subject to EPA Federal Categorical Pretreatment regulations under 40 C.F.R. Part 403.6 and 40 C.F.R. chapter I, subchapter N;
  - b. an industrial user that discharges an average of 25,000 gallons per day or more of process wastewater to the POTW;
  - c. an industrial user that contributes a process of Wastestream that makes up five percent or more of the average dry-weather hydraulic or organic capacity of the POTW treatment plant; or
  - d. an industrial user that is designated by the POTW on the basis that the industrial user has a reasonable potential for adversely affecting the POTW’s operation or for violating any pretreatment standard or requirement, in accordance with 40 C.F.R. Part 403.8(f)(6).
16. “Wastewater Treatment Plant” or “WWTP” means the Wastewater Treatment Plant identified in the NPDES permit issued to Geremarie and located at 1725 Ensell Road, Lake Zurich IL 60106.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

The Geremarie must submit the following information pursuant to Section 308(a) of the Act, 33 U.S.C. § 1318(a) within 30 days of receipt:

#### **General Operations**

1. Provide a comprehensive facility process description (identify raw materials, processes used, products produced/amount of finished product, and wastes and their destination; attach a process diagram if available).
2. How many hours does the facility operate per day? How many days does the facility operate per week?
3. Is the facility (or any part of the facility) subject to categorical Pretreatment Standards under 40 C.F.R. § 403.6(c)(2)? If so, what is the facility's average daily production during a representative year expressed in terms of mass of pollutant per unit of production (production-based standards)? For example, if the facility is a foundry, how many pounds of molten metal does the facility pour or inject into molds each day, in a representative year?
4. How many gallons of supply water does the facility use per day?
5. Is daily water usage measured or estimated? Provide details.
6. List the daily water usage (in gallons) for:
  - a. each production process,
  - b. the contact cooling water,
  - c. the boiler blowdown/makeup,
  - d. evaporation (loss),
  - e. non-contact cooling water, and
  - f. sanitary flow.
7. Have there been any significant changes in wastewater flow to the sewer in the past three years? (For the purpose of this request, a "significant change" is defined as a change greater than or equal to 20%.) If so, list the date and amount of each significant change.
8. Does the facility treat its process wastewater prior to discharge to the sewer? If so, describe the type of pretreatment system and include a comprehensive schematic description.
9. Does the facility use any best management practices (BMPs)? If so, provide a copy of the BMPs. BMPs are management and operational procedures that are intended to prevent pollutants from entering a facility's wastestream or reaching a discharge point.
10. Does the facility use a toxic organic management plan (TOMP)?<sup>[1]</sup> If so, provide a copy of the TOMP, and a record showing EPA's approval of the TOMP.



11. Does the facility have a chemical storage area? If so, identify the type and magnitude (e.g., number of 55-gallon drums) chemicals that are maintained on site and how they are stored.
12. Does the facility have any spill control measures? If so, provide a copy of the facility's spill prevention control and countermeasures (SPCC) plan.
13. Does the facility have any floor drains?
  - a. If so, can chemicals reach floor drains if spilled?
  - b. Do floor drains/troughs lead to the sewer?
14. Does the facility generate sludge? If so, describe:
  - a. The sludge dewatering method (e.g., plate/frame filter, belt press, rotating drum vacuum, centrifuge, indexing paper filters, etc.),
  - b. the amount generated (55 gal barrel [bbl]/mo),
  - c. what happens to the filtrate (liquid) from dewatering,
  - d. the sludge storage capacity,
  - e. the sludge shipping amounts and frequency, and
  - f. the name of the sludge hauler and manifests from the last year of operation.
15. Does the facility generate hazardous waste (as defined by 40 C.F.R. Part 261)? If so:
  - a. What type, quantity, and frequency of hazardous waste does the facility generate?
  - b. Describe how the facility disposes of hazardous waste.
  - c. Indicate whether the facility discharges hazardous wastes to the sewer.
  - d. If the facility discharges hazardous waste to the sewer, provide a copy of the notice required by 40 C.F.R. § 403.12(p).
16. Provide a copy of self-monitoring records for all sampling conducted over the past three years. Each monitoring record shall include a copy of:
  - a. The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
  - b. The dates analyses were performed;
  - c. Who performed the analyses;
  - d. The analytical techniques/methods used;
  - e. The results of such analyses;
  - f. Flow monitoring data;
  - g. Production data, if the facility is subject to production-based standards;
  - h. Chain of custody form(s); and
  - i. The certification required under 40 C.F.R. § 403.12(l), if the facility is a categorical industrial user.
17. How many sample points are at the facility?
18. Does the facility take samples and/or measure flow for all of its process wastewater discharges?
19. What type of flow monitoring device(s) does the facility use?
20. How often is the facility's flow monitoring device(s) calibrated?
21. Are any dilution wastestreams present at the facility's sample location(s)?

22. Do any of the facility's sample points represent discharges from a categorical process combined with one or more different categorical processes and/or dilution wastestreams? If so, then provide the following for each sample point:
- The presumed applicable categorical rule,
  - The average daily flow (at least a 30-day average) for each categorical stream,
  - The average daily flow (at least a 30-day average) for dilution streams, and
  - The average total daily flow (at least a 30-day average) through the sample point.
23. Has the facility exceeded any pretreatment standards in the past three years? If so, then:
- Provide a description of each exceedance,
  - Provide a copy of the notice required under 403.12(g)(2), and
  - Indicate whether the facility repeated sampling and analysis, and submitted results to EPA of the repeat analysis within 30 days discovering the exceedance.
24. Has the facility had one or more upsets in the past three years?<sup>[3]</sup> If so, did the facility notify EPA as required under 40 C.F.R. § 403.16(c)(3)?
25. Has the facility bypassed any part of its wastewater treatment system? If so, did the facility notify EPA as required under 40 C.F.R. § 403.17(c)?
26. Is the facility required to implement a sludge discharge control plan [under 40 C.F.R. § 403.8(f)(2)(vi)]?<sup>[4]</sup> If so, submit a copy of the plan.
27. Provide a copy of a baseline monitoring report [required under 40 C.F.R. § 403.12(b)].

#### Electroplating and Metal Finishing Operations

28. Are any of the following processes performed: electroplating, electroless plating, anodizing, coating, chemical etching and milling or printed circuit board manufacturing? If so, what ancillary processes are being performed?
29. What metals are being plated? What other metals are in use in solution or otherwise present in process tanks?
30. Describe any and all types of chemicals that make up plating baths. Confirm any presence of Cyanide, Chromium, or Ammonium persulfate (etching).
31. Describe how plating (concentrated) bath solutions are disposed. If so, how? Include full descriptions of any batch pretreatment prior to discharge, and disposal of any residual materials.
32. Confirm whether any tanks are heated.
33. Is any Cyanide bearing solutions or wastestreams present? What metals are complexed with cyanide? What chelating agents are used to hold metal(s) in solution?
34. Confirm whether alkaline cleaning or acid cleaning tanks are present in the solutions.
35. How often are cleaning solutions - both acidic and alkaline - changed and how are they disposed of? Volumes? Discharged as "slugs?" Any batch treatment prior to discharge? How are any residual metals (i.e., sludge) disposed of?
36. Are there any wastewaters discharged without pretreatment?
37. Are solvents and/or degreasing agents used? If so, what type and how is the sludge handled? How are they applied? Dip tank, rag applied, or other? Is solvent redistilled if used? Any discharge of solvents to sewer?
38. Any cooling water used?

39. If a TOMP was provided in response to question 10, above, which total toxic organics does the TOMP account for? How do you document compliance with the TOMP?
40. Are running rinses used? Countercurrent? Any still or dead rinses used? Spray rinses or fog rinses? Discharged to where?
41. Is there any water reuse within the plant? Pretreatment? Any water-cooled machinery? Discharge to and volumes? Does the facility use any cooling water? Volume and ultimate destination?
42. How is process wastewater from the plating room channeled to the treatment plant or sewers? Are there floor drains in the plating area? Are floors washed down regularly? Are domestic and process wastewater segregated (and cooling water, if applicable)? What is the discharge location for dilution streams? Do representative sampling points exist?
43. When did electroplating operations first begin? If the facility is subject to Part 413, were there any metal finishing operations added to the facility after initial construction?
44. Does the Facility operate independently of any other company?
45. Who owns the materials processed by the Company?
46. Describe how much plating is completed on the Facility in terms of surface area (square feet, etc.)?

<sup>[1]</sup> Regulated industrial users in the Electroplating, Metal Finishing, and Electrical and Electronic Components (both Phase I and Phase II) categories may implement a TOMP with EPA's prior approval.

<sup>[2]</sup> Under 40 C.F.R. § 403.6, dilution streams may be Boiler blowdown streams, non-contact cooling streams, stormwater streams, and demineralizer backwash streams; or sanitary wastestreams.

<sup>[3]</sup> Under 40 C.F.R. § 403.16(a), "upset" means an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the Industrial User.

<sup>[4]</sup> Under 40 C.F.R. § 403.8(f)(2)(vi), a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the sewage treatment plant's regulations, local limits or Permit conditions.